

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JORGE LUIS FERNANDEZ MEDINA
DEBTOR

CASE NO. 14-00282/ESL

CHAPTER 13

DEBTOR'S REPLY TO MOTION TO DISMISS, DOCKET #50

TO THE HONORABLE COURT:

COMES NOW, JORGE LUIS FERNANDEZ MEDINA, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On September 29, 2015, Money Express filed a motion to dismiss, docket #50, basically alleging that the debtor has defaulted in his Plan payments in the sum of \$1,000.00.
2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that he did incur in the Plan arrears due to certain economic problems.
3. The debtor hereby respectfully submits that on September 25, 2015 and on October 16, 2015, he made two (2) \$500.00 payments, for a total sum of \$1,000.00 in order to cure the arrears in his Plan payments. Attached is copy of the payments made to the Trustee.

WHEREFORE, debtor respectfully requests this Honorable Court deny the motion to dismiss, docket #50, filed by Money Express.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, José R. Carrión, Esq.; Maricarmen Colón Díaz, Esq.; Counsel for Money Express;

Page - 2 -
Debtor's Reply Motion to Dismiss
Case no. 14-00282/ESL

I also certify that a copy of this motion was sent via US Mail to the debtor, Jorge L. Fernandez Medina, to the address of record: PO Box 047, San Lorenzo, PR 00754.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 16th day of October, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

Inge Fernandez

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| SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION | Pay to | Jose R. Carrion Chapter 13 | | KEEP THIS RECEIPT FOR YOUR RECORDS |
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| | | | Clerk | 04 |

